

# **EXHIBIT C**

**JONES DAY**

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July 2, 2020

**VIA E-MAIL**

Jeremy Gray  
Early Sullivan Wright Gizer & McRae LLP  
6420 Wilshire Blvd., 17th Floor  
Los Angeles, CA 90048

Re: NRSC's Supplemental Responses to Plaintiff's First Set of Document Requests

Dear Mr. Gray:

This letter follows up on your correspondence dated June 22, 2020 and the subsequent conversation I had with Zach Gidding on June 26.

We want to reiterate our objection to producing confidential documents and a privilege log without entry of a protective order. On the other hand, we will produce non-confidential and non-privileged responsive documents to which we have not otherwise made an objection.

We also want to supplement our responses to your first set of document requests to indicate whether any responsive documents are being withheld on the basis of an objection or claim of privilege pursuant to Rule 34(b)(2)(C). Based on a search of reasonably accessible documents held by relevant custodians and generated between November 29, 2017 and May 8, 2018, the NRSC is withholding documents in its possession, custody, or control responsive to the following document requests on the basis of an objection and/or claim of privilege: 1-13, 18, 19, 21, 25, 27, 31-33, 37, 40, 45, 46, 49, and 53.

Additionally, we understand from our discussion on June 26 that our search for documents related to an alleged agreement to defame Plaintiff, knowledge of Plaintiff's criminal record, and NRSC employees' thoughts, impressions, opinions, and courses of action with respect to Plaintiff's candidacy addressed your concerns regarding the NRSC's relevancy and proportionality objections.

Please let us know if you would like to discuss anything further.

JONES DAY

Jeremy Gray  
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Sincerely

*Stephen J. Kenny*  
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